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March 27, 2008

Mr. Sam Chummar, Remedial Project Manager  
U.S. Environmental Protection Agency - Region 5  
Superfund Division - Remedial Response Branch #1  
77 W. Jackson Blvd. (SR-6J)  
Chicago, IL 60604

Subject: Response to March 21, 2008 Comment Letter  
RI/FS Work Plan Addendum No. 1 - PCB Investigation Activities Near Mill Building Banks  
Plainwell Mill Operable Unit #7  
Allied Paper, Inc./Portage Creek/Kalamazoo River Site

Dear Mr. Chummar:

Thank you for your March 21, 2008 letter providing comments on Addendum No. 1 PCB Investigation Activities Near Mill Building Banks. This letter provides a formal response to both the specific and general comments included in that letter.

Specific Comments:

1. Section 1- page 1 Paragraph 1 – the work plan is described as an addendum to the draft Remedial Investigation/Feasibility Study (RI/FS) Work Plan. Since this work is a result of the Plainwell Mill Banks Emergency Action, this work should be considered an addendum to the *Plainwell Mill Banks Emergency Action Design Report*.

**Response:** Weyerhaeuser can perform the proposed work under the same authorization as the Plainwell Mill Banks Emergency action if approved by United States Environmental Protection Agency (USEPA). However, the work needs to be done in a manner consistent with our January 2005 Consent Decree (CD) for the Design and Implementation of Certain Response Action at Operable Unit #4 and the Plainwell Inc Mill Property of the Allied Paper, Inc./Portage Creek/Kalamazoo River Site. The CD establishes that actions between the top of banks of the Kalamazoo River and the middle of the stream bed will be addressed as part of the remedial action for the Kalamazoo River operable unit. (Section IV Definitions – Paragraph 4 - Mill Remedial Action). Since the PCB Investigation Activities Near Mill Building Banks are focused between the top of the banks and the Mill Buildings, Weyerhaeuser believes that this work is associated with Operable Unit #7, the Plainwell Mill, Inc. Property and thus is eligible for reimbursement under the provisions of the CD. Weyerhaeuser thus plans to apply for reimbursement for these activities. Please confirm that USEPA has a similar understanding when you respond to this letter.

Presuming that USEPA agrees with this interpretation, text that appears in various sections of the Addendum that specifies that these PCB Investigation Activities are being conducted as an addendum of the Plainwell Mill RI/FS work plan will be modified to state that these upland tasks are being authorized as an addendum to the Plainwell Mill Bank Emergency response activities being conducted under Paragraph 67 of the CD.

Finally, for clarification, it is Weyerhaeuser's interpretation that, although your comment states that the proposed work plan is a 'result' of the Plainwell Mill Banks Emergency Action, a more specific statement is that

the conditions being addressed by the work plan were 'identified' during the Plainwell Mill Banks Emergency Action.

2. Section 2.1 – Page 3- paragraph 1 – Please remove the word 'immediate' from the second to last sentence.

**Response:** The second to the last sentence will be reworded without the word 'immediate' as follows: "The City, as property owner, was notified as were USEPA and MDEQ."

3. Section 3.1 – Page 6 – Bullets- Please eliminate these bullet points as this work plan is being considered an addendum to the *Plainwell Mill Banks Emergency Action Design Report*.

**Response:** The objectives from the Plainwell Mill RI/FS work plan will be removed in the final work plan.

#### General Comments

1. The scope of this work plan should remain focused on answering the questions posed in the February 18, 2008 letter to United States Environmental Protection Agency (USEPA) in an expedited manner. Please take any practicable steps to expedite the implementation of this work plan and development of the *Focused Work Plan for Phase 2*. Once such step is suggested in Section 4.2 of the work plan, and that is to run Task 1 and 2 concurrently.

**Response:** To the extent possible, based upon weather conditions and the schedule availability of the Geophysics subcontractor, the Task 1 and 2 activities will be performed concurrently.

We would appreciate an expeditious response to this letter so that we can modify the work plan and obtain formal approval to implement the tasks that have been outlined. Please contact Jim Hutchens, Kathy Huibregtse or myself at your earliest convenience if you have any questions or would like to discuss the responses further. We will submit the revised work plan in final form as soon as we receive your feedback. Thank you for your prompt attention to this matter.

Sincerely,  
Weyerhaeuser Company



Jennifer Hale  
Environmental Manager

cc: Paul Bucholtz, MDEQ  
Erik Wilson, City of Plainwell  
Kathy Huibregtse, RMT, Inc.  
Jim Hutchens, RMT, Inc.